III. PROPOSED SUGGESTED CONTROL MEASURE

In this chapter, we provide a plain English discussion of the staff's proposed SCM for automotive coatings, which is contained in Appendix A. All sections of the proposed SCM are discussed below. Where applicable, key terms or concepts of the proposed SCM are discussed.

Control of emissions from automotive coatings is primarily the responsibility of the districts. The proposed SCM may be used as a model by the districts when adopting and amending their local automotive coatings rules. Accordingly, throughout the staff report references are made to the most common or most restrictive district VOC limits, since the district rules are the enforceable regulations.

A. APPLICABILITY

The proposed SCM applies to manufacturers, distributors, sellers, and users of automotive coatings, but does not apply to aerosol coatings in containers of any size. The proposed SCM applies to coatings that are used to coat any part or component of motor vehicles (such as cars, buses, and golf carts) or mobile equipment (such as railcars and tractors). For the complete definitions of motor vehicle and mobile equipment, please see sections 3.19 and 3.20 of the proposed SCM. The proposed SCM also applies to manufacturers, distributors, sellers, and users of solvents used in cleaning operations.

B. DEFINITIONS

To help clarify and enforce the proposed SCM, section 3 of the proposed SCM provides definitions for terms used which are not self-explanatory. This section also provides equations to determine the VOC content of automotive coatings.

C. STANDARDS

The proposed SCM differs from the U.S. EPA's national rule and current district rules by eliminating the composite VOC limit for basecoat (color) and clear coating systems. The composite VOC limit is being replaced with individual VOC limits for color coatings and clear coatings. A total of 12 VOC limits are proposed, which would become effective on or after January 1, 2009.

The table of standards in the proposed SCM, reprinted below as Table III-1, contains the proposed limits for maximum VOC content in each category of automotive coatings. If the coating is represented in such a way that indicates it can be used in more than one of the coating categories listed in Table III-1, then the lowest, or most restrictive, VOC content limit will apply.

If a coating does not meet any of the definitions for the specific categories listed in Table III-1, that coating will fall into the category labeled “Any other coating type” and the VOC limit of 250 grams per liter (g/l) will apply. Limits are expressed in grams of VOC per liter of coating thinned to the manufacturer’s maximum recommendation, excluding the volume of any water and exempt compounds.

Table III-1 - Proposed Coating Categories and VOC Limits

Coating Category	VOC regulatory limit as applied Effective January 1, 2009	
	grams/liter	(pounds per gallon*)
Adhesion Promoter	540	4.5
Clear Coating	250	2.1
Color Coating	420	3.5
Multi-Color Coating	680	5.7
Pretreatment Coating	660	5.5
Primer	250	2.1
Single-Stage Coating	340	2.8
Temporary Protective Coating	60	0.5
Truck Bed Liner Coating	310	2.6
Underbody Coating	430	(3.6
Uniform Finish Coating	540	4.5
Any other coating type	250	2.1

* English units are provided for information only. VOC limits are expressed in grams VOC per liter of coating, less water and exempt compounds.

The proposed SCM also prohibits anyone from applying, manufacturing, blending, repackaging for sale, supplying, offering for sale, distributing, possessing (at an automotive refinishing facility) or selling any coating that does not meet the VOC limits listed in Table III-1, except when the coating is sold for use with an approved emission control system that is at least 85 percent efficient. It is a violation of the proposed SCM to solicit, require or specify the use of a coating that does not meet the VOC limits set forth in Table III-1, unless the coatings are used at a facility that complies with section 4.3 (alternative compliance provisions).

The standards section specifies the manner in which coatings may be applied. With the exception of underbody coatings, truck bed liner coatings, coatings used in graphic arts and coatings of any type if less than one fluid ounce, the automotive coating must be applied by brushing, dipping, rolling, electrostatic spraying, or spraying with a high-volume, low-pressure spray (HVLP) gun or an approved equivalent.

Section 4.8 of the proposed SCM also prohibits the use of solvents that exceed a VOC content of 25 g/l at an automotive refinishing facility, and specifies that any VOC-containing materials or products must be stored in closed, vapor-tight containers when not in use. Spray guns must be cleaned in a closed system or its approved equivalent.

D. ADMINISTRATIVE REQUIREMENTS

The proposed SCM requires each manufacturer to provide written data for each of their products that includes the physical properties of the coating, coating component, or solvent. For a complete description of what information must be included on the manufacturer data sheets, please see sections 5.1.1, 5.1.2, and 5.1.3 of the proposed SCM. Manufacturers must also clearly label all coatings and coating components with the applicable use categories listed in Table III-1 and the VOC content. Manufacturers must label solvents with the VOC content.

The proposed SCM requires that those who use automotive coatings or solvents at automotive refinishing facilities keep records indicating the name and manufacturer of the coating or solvent, method of applying the coating or solvent, coating type and mix ratio, VOC content of the coating or solvent, and whether the product used is a coating or a solvent. This information, along with manufacturer's data sheets or other written materials that provide the actual and regulatory VOC content and purchase records listing the coating type, name, and volume of coatings or solvents must be kept at the location where the coatings are applied for a minimum of three years. These records are to be made available for inspection upon request.

Anyone using an approved emission control system per section 4.3 instead of using coatings that meet the VOC limits in Table III-1 must keep daily records, to be maintained for a minimum of three years. These records will prove continuous and correct use of the control system during the time that emissions are occurring.

The proposed SCM specifies that no person shall manufacture, blend, repackage for sale, supply, sell, offer for sale, or distribute or apply any automotive coating or automotive coating component that does not meet the VOC limits in the proposed SCM. However, if the coating is for use exclusively within an emission control system or outside the district, a person may manufacture, blend, repackage for sale, supply, sell, offer for sale, or distribute an automotive coating or component that does not meet the VOC limits. In this situation, that person must keep records of the quantity manufactured, blended, repackaged, supplied, sold, offered for sale, or distributed; size and number of containers; VOC content; name, address, phone number, retail tax license number, and valid district permit number for the person to whom or for whom the coating or component was manufactured, blended, repackaged, supplied, sold, offered for sale or distributed; and whether the coating is for use in an approved emissions control system or outside the district. As with all records pertaining to the proposed SCM, this information must be kept for a minimum of three years and be made available for inspection upon request.

E. TEST METHODS

Test methods for automotive coatings and solvents subject to the proposed SCM are provided in this section. These include tests for metallic and acid content, tests for the determination of various exempt compounds, a method for determining VOC content of solvents or coatings, tests to determine control and transfer efficiency, and a method to determine if a spray gun's transfer efficiency is equivalent to that of a HVLP spray gun. Please see section 6 of the proposed SCM for complete descriptions and reference numbers for these test methods.